

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

CENTRAL SOURCE LLC,
P.O. Box 105283
Atlanta, Georgia, 30348,

Plaintiff,

V.

Civil Action No. _____

aannualcreditreports.com,
aannualfreecreditreport.com,
anannualcreditreport.com,
annuaalcreditreports.com,
annuacreditreports.com,
annualccreditreports.com,
annualconsumercreditreport.com,
annualcrdeitreports.com,
annualcredidtreports.com,
annualcrediitreports.com,
annualcreditrepteports.com,
annualcreditareport.com,
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annualcreditreportform.com,
annualcreditreportport.com,
annualcreditreportrt.com,
annual-credit-reports.com,
annualcreditreportscore.com,
annualcreditreportservices.com,
annualcreditreportss.com,
annualcreditreportts.com,
annualcreditreportx.com,
annualcreditrepotrs.com,
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annualdreecreditreport.com,
annualfeecreditreport.com,
annualferecreditreport.com,
annualffreecreditreport.com,
annualfreeccreditreport.com,
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californiaannualcreditreport.com,
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comfreeannualcreditreport.com,
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ffreeannualcreditreport.com,
firstannualcreditreport.com,
freaannualcreditreport.com,
freeannualcreditffreport.com,
freeannualcreditreportsrlimited.com,
freeannualfreecreditreport.com,
freecannualcreditreport.com,

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wwwannualcreditcreditreport.com,
wwwannualcreditereport.com,
wwwannualcreditreditreport.com,
wwwannualfreecreditreport.com,
and wwwannuallycreditreport.com,

Defendants.

COMPLAINT

Plaintiff Central Source LLC (“Central Source”), through counsel, alleges as follows for its *in rem* Complaint against Defendants aannualcreditreports.com, aannualfreecreditreport.com,

anannualcreditreport.com,	annuaalcreditreports.com,	annuacldreditreports.com,
annualccreditreports.com,	annualconsumercreditreport.com,	annualcrdeitreports.com,
annualcredittreports.com,	annualcrediitreports.com,	annualcredirteports.com,
annualcreditareport.com,	annualcrediterports.com,	annualcrediterreport.com,

annualcreditreport.com, annualcreditreports.com, annualcreditreports.com,
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 annualcreditreportform.com, annualcreditreportport.com, annualcreditreportrt.com, annual-credit-
 reports.com, annualcreditreportscore.com, annualcreditreportservices.com,
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 annualdreecreditreport.com, annualfeeecreditreport.com, annualferecreditreport.com,
 annualffreecreditreport.com, annualfreeccreditreport.com, annualfreecreditreport6.com,
 annualfreecreditreportt.com, annualfreecreditreport.com, annualfreecreditsreport.com,
 annualfreecredittreport.com, annualfreeecreditreport.com, annualfreecreditreport.com,
 annualfrercreditreport.com, annualfrewcreditreport.com, annualfrecreditreport.com,
 annualfreecreditreport.com, annualfrwecreditreport.com, annualfteecreditreport.com,
 annualgreecreditreport.com, annuallecreditreport.com, annuallfreecreditreports.com,
 annualrcreditreports.com, annualrfeecreditreport.com, annualsocialcreditreport.com,
 annualtfreecreditreport.com, annuualcreditreports.com, anual-credit-report.com,
 anunalcreditreports.com, californiaannualcreditreport.com, comannualcreditreports.com,
 comannualfreecreditreport.com, comfreeannualcreditreport.com, commyannualcreditreport.com,
 dreeannualcreditreport.com, federalannualcreditreport.com, feeannualcreditreport.com,
 feeecannualcreditreport.com, ffreeannualcreditreport.com, firstannualcreditreport.com,
 freaannualcreditreport.com, freeannualcreditffreport.com, freeannualcreditreportsrlimited.com,
 freeannualfreecreditreport.com, freeannualcreditreport.com, frerannualcreditreport.com,
 frereannualcreditreport.com, frewannualcreditreport.com, freeannualcreditreport.com,

frweannualcreditreport.com, fteeannualcreditreport.com, greeannualcreditreport.com,
mmyannualcreditreport.com, mtannualcreditreport.com, myaannualcreditreport.com,
myannualccreditreport.com, myannualcreditreports.com, myannualcreditreport.com,
myannualcredittreport.com, myannualcredityreport.com, mymyannualcreditreport.com,
myyannualcreditreport.com, nnualcreditreports.com, nyannualcreditreport.com,
rannualcreditreport.com, reeannualcreditreport.com, vannualcreditreport.com,
visitannualcreditreport.com, wwwannualcreditcreditreport.com, wwwannualcreditereport.com,
wwwannualcreditreditreport.com, wwwannualfreecreditreport.com, and
wwwannuallycreditreport.com (the “Domain Names”).

NATURE OF THE SUIT

1. This is an *in rem* action for cybersquatting under the Federal Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d), and trademark infringement under the Lanham Act, 15 U.S.C. § 1114(1)(a).

2. Recent studies have shown that over 95% of the 500 most popular sites on the Internet are the subject of “typosquatting”—registration or use of a domain name that represents a typographical error of the legitimate site—and which is typically used to display advertisements related to the legitimate site, to distribute computer viruses or “malware,” or to collect visitors’ personal information for inappropriate or illegal uses.

3. Typosquatting harms consumers by causing confusion with the legitimate sites being sought by the consumers and very often results in consumers’ computers being infected with computer viruses, “bloatware” or other unwanted software, consumer’s personal information being collected and misused, and/or consumers being presented with an endless stream of unwanted advertisements.

4. In the present case, Plaintiff's invaluable rights in the distinctive AnnualCreditReport mark have been deliberately infringed through the bad faith registration and use of the Defendant Domain Names, which domain names are confusingly similar to the AnnualCreditReport mark. Plaintiff previously has taken action to protect consumers from similar websites through the pursuit of a number of suits in this Court obtaining the transfer of domain names that infringe upon the AnnualCreditReport mark and were registered and/or used in bad faith. *See Central Source LLC v. annualcreditreports.com*, 1:20-CV-792 (filed July 15, 2020); *Central Source LLC v. annaulcreditreports.com*, 1:20-CV-84 (filed Jan. 24, 2020); *Central Source LLC v. annalcreditreport.co*, 18-CV-1316 (filed Oct. 19, 2018); *Central Source LLC v. annualcreditreportmonitoring.com*, 18-CV-453 (filed Apr. 19, 2018); *Central Source LLC v. afreeannualcreditreport.com*, 17-CV-581 (E.D. Va. June 8, 2018); *Central Source LLC v. freeannualcfreditreport.com*, 17-CV-63 (E.D. Va. May 23, 2017); *Central Source LLC v. freeannualcreditreport2014.com*, 16-CV-465 (Feb. 27, 2017); *Central Source LLC v. anmnualcreditreport.com*, 14-CV-1754 (E.D. Va. Aug. 19, 2015); *Central Source LLC v. annualcrsditreport.com*, 14-CV-1755, 2015 WL 1880187 (E.D. Va. Apr. 23, 2015); *Central Source LLC v. aniuualcreditreport.com*, 14-CV-1345 (E.D. Va. Mar. 2, 2015); *Central Source LLC v. aabbualcreditreport.com*, 14-CV-918 (E.D. Va. Nov. 12, 2014, amended Nov. 18, 2014); *Central Source LLC v. annualcreditedport.com*, 14-CV-302, 2014 WL 3891667 (E.D. Va. Aug. 7, 2014); *Central Source LLC v. annualdcreditreport.com*, No. 14-CV-304, 2014 WL 371162 (E.D. Va. Aug. 1, 2014); *Central Source LLC v. annualcreditreport-com.us*, 14-CV-305, 2014 WL 3767071 (E.D. Va. July 30, 2014).

PARTIES

5. Central Source is a corporation organized and existing under the laws of Delaware with a principal business address of P.O. Box 105283, Atlanta, Georgia, 30348.

6. aannualcreditreports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for aannualcreditreports.com is attached as Exhibit 1.

7. aannualfreecreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for aannualfreecreditreport.com is attached as Exhibit 2.

8. anannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for anannualcreditreport.com is attached as Exhibit 3.

9. annuaalcreditreports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annuaalcreditreports.com is attached as Exhibit 4.

10. annuacreditreports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annuacreditreports.com is attached as Exhibit 5.

11. annualccreditreports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualccreditreports.com is attached as Exhibit 6.

12. annualconsumercreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualconsumercreditreport.com is attached as Exhibit 7.

13. annualcrdeitreports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualcrdeitreports.com is attached as Exhibit 8.

14. annualcreditreports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the

domain name. A copy of the domain name registration record for annualcreditreports.com is attached as Exhibit 9.

15. annualcreditreports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualcreditreports.com is attached as Exhibit 10.

16. annualcreditreports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualcreditreports.com is attached as Exhibit 11.

17. annualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualcreditreport.com is attached as Exhibit 12.

18. annualcrediterports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualcrediterports.com is attached as Exhibit 13.

19. annualcrediterreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Redacted for Priavacy.” A

copy of the domain name registration record for annualcrediterreport.com.com is attached as Exhibit 14.

20. annualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Registration Private.” A copy of the domain name registration record for annualcreditreport.com is attached as Exhibit 15.

21. annualcreditreports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualcreditreports.com is attached as Exhibit 16.

22. annualcreditreprrts.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualcreditreprrts.com is attached as Exhibit 17.

23. annualcreditrepoorts.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualcreditrepoorts.com is attached as Exhibit 18.

24. annualcreditreprrts.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual

located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualcreditreportrts.com is attached as Exhibit 19.

25. annualcreditreportes.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualcreditreportes.com is attached as Exhibit 20.

26. annualcreditreportform.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Registration Private.” A copy of the domain name registration record for annualcreditreportform.com is attached as Exhibit 21.

27. annualcreditreportport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Registration Private.” A copy of the domain name registration record for annualcreditreportport.com is attached as Exhibit 22.

28. annualcreditreportrt.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Registration Private.” A copy of the domain name registration record for annualcreditreportrt.com is attached as Exhibit 23.

29. annual-credit-reports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Redacted for Privacy.” A

copy of the domain name registration record for annual-credit-reports.com is attached as Exhibit 24.

30. annualcreditreportscore.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Super Privacy Service LTD c/o Dynadot.” A copy of the domain name registration record for annualcreditreportscore.com is attached as Exhibit 25.

31. annualcreditreportservices.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Super Privacy Service LTD c/o Dynadot.” A copy of the domain name registration record for annualcreditreportservices.com is attached as Exhibit 26.

32. annualcreditreportss.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualcreditreportss.com is attached as Exhibit 27.

33. annualcreditreportts.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualcreditreportts.com is attached as Exhibit 28.

34. annualcreditreportx.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the

domain name. A copy of the domain name registration record for annualcreditreportx.com is attached as Exhibit 29.

35. annualcreditrepotrs.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualcreditrepotrs.com is attached as Exhibit 30.

36. annualcreditreports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualcreditreports.com is attached as Exhibit 31.

37. annualcreditrpeorts.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualcreditrpeorts.com is attached as Exhibit 32.

38. annualcredtireports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualcredtireports.com is attached as Exhibit 33.

39. annualcreditreports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualcreditreports.com is attached as Exhibit 34.

40. annualcreditreports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualcreditreports.com is attached as Exhibit 35.

41. annualdreecreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualdreecreditreport.com is attached as Exhibit 36.

42. annualfeeecreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualfeeecreditreport.com is attached as Exhibit 37.

43. annualferecreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the

domain name. A copy of the domain name registration record for annualferecreditreport.com is attached as Exhibit 38.

44. annualffreecreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualffreecreditreport.com is attached as Exhibit 39.

45. annualfreeccreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Redacted for Privacy.” A copy of the domain name registration record for annualfreeccreditreport.com is attached as Exhibit 40.

46. annualfreecreditreport6.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Redacted for Privacy.” A copy of the domain name registration record for annualfreecreditreport6.com is attached as Exhibit 41.

47. annualfreecreditreportt.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualfreecreditreportt.com is attached as Exhibit 42.

48. annualfreecreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record

for the domain name. A copy of the domain name registration record for annualfreecreditreport.com is attached as Exhibit 43.

49. annualfreecreditsreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Registration Private.” A copy of the domain name registration record for annualfreecreditsreport.com is attached as Exhibit 44.

50. annualfreecreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualfreecreditreport.com is attached as Exhibit 45.

51. annualfreecreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualfreecreditreport.com is attached as Exhibit 46.

52. annualfreescreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualfreescreditreport.com is attached as Exhibit 47.

53. annualfrercreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual

located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualfrercreditreport.com is attached as Exhibit 48.

54. annualfrewcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualfrewcreditreport.com is attached as Exhibit 49.

55. annualfrrecreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualfrrecreditreport.com is attached as Exhibit 50.

56. annualfrrecreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualfrrecreditreport.com is attached as Exhibit 51.

57. annualfrwecreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualfrwecreditreport.com is attached as Exhibit 52.

58. annualfteecreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualfteecreditreport.com is attached as Exhibit 53.

59. annualgreecreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualgreecreditreport.com is attached as Exhibit 54.

60. annuallecreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Registration Private.” A copy of the domain name registration record for annuallecreditreport.com is attached as Exhibit 55.

61. annuallfreecreditreports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Redacted for Privacy.” A copy of the domain name registration record for annuallfreecreditreports.com is attached as Exhibit 56.

62. annualrcreditreports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualrcreditreports.com is attached as Exhibit 57.

63. annualfeecreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annualfeecreditreport.com is attached as Exhibit 58.

64. annualsecialcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Redacted for Privacy.” A copy of the domain name registration record for annualsecialcreditreport.com is attached as Exhibit 59.

65. annualfreecreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Registration Private.” A copy of the domain name registration record for annualfreecreditreport.com is attached as Exhibit 60.

66. annuualcreditreports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for annuualcreditreports.com is attached as Exhibit 61.

67. anual-credit-report.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by is registered by “Super Privacy Service LTD c/o Dynadot.” A copy of the domain name registration record for anual-credit-report.com is attached as Exhibit 62.

68. anunalcreditreports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for anunalcreditreports.com is attached as Exhibit 63.

69. californiaannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Virginia in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for californiaannualcreditreport.com is attached as Exhibit 64.

70. comannualcreditreports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for comannualcreditreports.com is attached as Exhibit 65.

71. comannualfreecreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for comannualfreecreditreport.com is attached as Exhibit 66.

72. comfreeannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record

for the domain name. A copy of the domain name registration record for comfreeannualcreditreport.com is attached as Exhibit 67.

73. commyannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for commyannualcreditreport.com is attached as Exhibit 68.

74. dreeannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for dreeannualcreditreport.com is attached as Exhibit 69.

75. federalannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Super Privacy Service LTD c/o Dynadot.” A copy of the domain name registration record for federalannualcreditreport.com is attached as Exhibit 70.

76. feeannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Registration Private.” A copy of the domain name registration record for feeannualcreditreport.com is attached as Exhibit 71.

77. feeannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the

domain name. A copy of the domain name registration record for feeeannualcreditreport.com is attached as Exhibit 72.

78. ffreeannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for ffreeannualcreditreport.com is attached as Exhibit 73.

79. firstannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for firstannualcreditreport.com is attached as Exhibit 74.

80. freaannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by "Registration Private." A copy of the domain name registration record for freaannualcreditreport.com is attached as Exhibit 75.

81. freeannualcreditffreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by "Registration Private." A copy of the domain name registration record for freeannualcreditffreport.com is attached as Exhibit 76.

82. freeannualcreditreportsrlimited.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record

for the domain name. A copy of the domain name registration record for freeannualcreditreportsrlimited.com is attached as Exhibit 77.

83. freeannualfreecreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for freeannualfreecreditreport.com is attached as Exhibit 78.

84. freecannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Registration Private.” A copy of the domain name registration record for freecannualcreditreport.com is attached as Exhibit 79.

85. frerannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for frerannualcreditreport.com is attached as Exhibit 80.

86. frereannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Registration Private.” A copy of the domain name registration record for frereannualcreditreport.com is attached as Exhibit 81.

87. frewannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record

for the domain name. A copy of the domain name registration record for frewannualcreditreport.com is attached as Exhibit 82.

88. frreeannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for frreeannualcreditreport.com is attached as Exhibit 83.

89. frweannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for frweannualcreditreport.com is attached as Exhibit 84.

90. fteeannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for fteeannualcreditreport.com is attached as Exhibit 85.

91. greeannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for greeannualcreditreport.com is attached as Exhibit 86.

92. mmyannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for mmyannualcreditreport.com is attached as Exhibit 87.

93. mtannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for mtannualcreditreport.com is attached as Exhibit 88.

94. myaannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for myaannualcreditreport.com is attached as Exhibit 89.

95. myannualccreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for myannualccreditreport.com is attached as Exhibit 90.

96. myannualcreditreports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by "Registration Private." A

copy of the domain name registration record for myannualcreditreports.com is attached as Exhibit 91.

97. myannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for myannualcreditreport.com is attached as Exhibit 92.

98. myannualcredittreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for myannualcredittreport.com is attached as Exhibit 93.

99. myannualcredityreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by "Registration Private." A copy of the domain name registration record for myannualcredityreport.com is attached as Exhibit 94.

100. mymyannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for mymyannualcreditreport.com is attached as Exhibit 95.

101. myyannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified

individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for myyannualcreditreport.com is attached as Exhibit 96.

102. nnualcreditreports.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for nnualcreditreports.com is attached as Exhibit 97.

103. nyannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for nyannualcreditreport.com is attached as Exhibit 98.

104. rannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Super Privacy Service LTD c/o Dynadot.” A copy of the domain name registration record for rannualcreditreport.com is attached as Exhibit 99.

105. reeannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for reeannualcreditreport.com is attached as Exhibit 100.

106. vannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for vannualcreditreport.com is attached as Exhibit 101.

107. visitannualcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Registration Private.” A copy of the domain name registration record for visitannualcreditreport.com is attached as Exhibit 102.

108. wwwannualcreditcreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Registration Private.” A copy of the domain name registration record for wwwannualcreditcreditreport.com is attached as Exhibit 103.

109. wwwannualcreditereport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by an unidentified individual located in Anhui, China in that there is no registrant field on the public WhoIs record for the domain name. A copy of the domain name registration record for wwwannualcreditereport.com is attached as Exhibit 104.

110. wwwannualcreditreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Registration Private.” A copy of the domain name registration record for wwwannualcreditreditreport.com is attached as Exhibit 105.

111. wwwannualfreecreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Registration Private.” A copy of the domain name registration record for wwwannualfreecreditreport.com is attached as Exhibit 106.

112. wwwannuallycreditreport.com is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered by “Registration Private.” A copy of the domain name registration record for wwwannuallycreditreport.com is attached as Exhibit 107.

JURISDICTION, VENUE AND JOINDER

113. This is a civil action for federal cybersquatting in violation of the Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d), and for trademark infringement under the Lanham Act, 15 U.S.C. § 1114(1)(a).

114. This Court has original jurisdiction under 15 U.S.C. § 1121(a) and 28 U.S.C. §§ 1331 and 1338(a).

115. This Court has *in rem* jurisdiction over the Defendant Domain Names pursuant to 15 U.S.C. § 1125(d)(2)(A). *In rem* jurisdiction is appropriate under 15 U.S.C. § 1125(d)(2)(A)(ii) because there is either no registrant field corresponding with the Defendant Domain Names, or where there is a registrant field, that field reflects a privacy service or, a fictitious person/entity, and/or an individual residing outside the United States, and therefore Plaintiff cannot obtain *in personam* jurisdiction over a person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A) and/or Central Source, despite its due diligence, has been unable to find a person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A).

116. Pursuant to 15 U.S.C. § 1125(d)(2)(A)(ii)(II)(aa), Central Source will give notice of the violations of Central Source's rights, and Central Source's intent to proceed *in rem*, to the contact addresses set forth in the registration records for each of the Defendant Domain Names.

117. Venue is proper in this District pursuant to 15 U.S.C. § 1125(d)(2)(C) in that the .COM domain name registry operator, VeriSign, Inc., is situated in this judicial district, and the Defendant Domain Names are all .COM domain names.

118. Joinder of the Defendant Domain Names is proper under Fed. R. Civ. P. 20(a)(2) in that the *in rem* cybersquatting and trademark infringement claims set forth herein appear to arise out of the same series of transactions and the same questions of law are common to all of the Defendant Domain Names. Specifically, since 2004, Central Source had protectible rights in the AnnualCreditReport mark which was publicly launched and became widely known in 2004. The subsequent bad faith registration and/or use of the Defendant Domain Names that include typographical errors of Central Source's mark or include extraneous, nondistinctive words constitutes typosquatting and infringement on Central Source's famous mark.

CENTRAL SOURCE'S RIGHTS

119. Central Source was created in 2004 to provide consumers with a secure means to request and obtain a free credit report once every 12 months in accordance with the Fair and Accurate Credit Transactions Act. 15 U.S.C. § 1681j.

120. Central Source provides this service to consumers through a website and service available at www.AnnualCreditReport.com, and AnnualCreditReport is the only service/site authorized by the U.S. Federal Trade Commission and the Consumer Financial Protection Bureau to provide this service.

121. Central Source registered the AnnualCreditReport.com domain name on June 25, 2004.

122. Over the course of June and July of 2004, Central Source registered a large number of additional related domain names and now owns more than 600 domain names representing typographical errors of AnnualCreditReport as a defensive measure intended to protect consumers by limiting cybersquatting of domain name registrations related to AnnualCreditReport.

123. Central Source began promoting the AnnualCreditReport mark and website in a press release issued on November 23, 2004. This promotion resulted in several major media organizations nationwide publishing stories that referenced the AnnualCreditReport mark and the AnnualCreditReport.com website address. These organizations included *The Chicago Tribune*, *The Kansas City Star*, *The New York Times*, *The Sacramento Bee*, *The San Francisco Chronicle*, *The Star-Ledger*, *USA TODAY*, and *The Washington Post*.

124. As a result of Central Source's promotion of the AnnualCreditReport mark and AnnualCreditReport.com domain name and the corresponding media coverage, consumers immediately associated the AnnualCreditReport mark and the AnnualCreditReport.com domain name with Central Source.

125. The AnnualCreditReport service was launched for public use on November 30, 2004.

126. Since opening for public use, AnnualCreditReport received more than 700,000,000 visits to AnnualCreditReport.com.

127. The U.S. Federal Trade Commission has engaged in a wide-ranging public service campaign promoting AnnualCreditReport through informational websites, television and Internet commercials, and audio public service announcements.

128. The Federal Trade Commission has also previously pursued unauthorized Internet uses of AnnualCreditReport and typographical variations of AnnualCreditReport.

129. The Credit Card Accountability Responsibility and Disclosure Act (the “CARD Act”) requires certain mandatory references to AnnualCreditReport.com whenever an advertisement or website offers a free credit report.

130. Pursuant to 15 U.S.C. § 1681j(g):

[A]ny advertisement for a free credit report in any medium shall prominently disclose in such advertisement that free credit reports are available under Federal law at: “AnnualCreditReport.com” (or such other source as may be authorized under Federal law).

131. Pursuant to 12 C.F.R. § 1022.138(b):

(3) Print advertisements. All advertisements for free credit reports in print shall include the following disclosure in the form specified below and in close proximity to the first mention of a free credit report. The first line of the disclosure shall be centered and contain only the following language: “THIS NOTICE IS REQUIRED BY LAW.” Immediately below the first line of the disclosure the following language shall appear: “You have the right to a free credit report from AnnualCreditReport.com or (877) 322-8228, the ONLY authorized source under Federal law.”

(4) Web sites. Any Web site offering free credit reports must display the disclosure set forth in paragraphs (b)(4)(i), (ii), and (v) of this section on each page that mentions a free credit report and on each page of the ordering process. (i) The first element of the disclosure shall be a header that is centered and shall consist of the following text: “THIS NOTICE IS REQUIRED BY LAW. ...”; (ii) The second element of the disclosure shall appear below the header required by paragraph (b)(4)(i) and shall consist of the following text: “You have the right to a free credit report from AnnualCreditReport.com or (877) 322-8228, the ONLY authorized source under Federal law.” The reference to AnnualCreditReport.com shall be an operational hyperlink to the centralized source, underlined, and in the same color as the hyperlink to consumerfinance.gov/learnmore required in § 1022.138(b)(4)(i); (v) The third element of the disclosure shall appear below the text required by paragraph (b)(4)(ii) and shall be an operational hyperlink to AnnualCreditReport.com that appears as a centered button containing the following language: “Take me to the authorized source.”

132. The mandatory disclosures required by federal law under 15 U.S.C. § 1681j(g) and 12 C.F.R. § 1022.138 have resulted in millions of references to AnnualCreditReport being presented to consumers.

133. Through promotion of AnnualCreditReport by Central Source, the Federal Trade Commission, and third parties that are statutorily required to identify AnnualCreditReport, the AnnualCreditReport mark has become famous and/or distinctive throughout the United States in connection with Central Source's services.

134. The Defendant Domain Names represent unauthorized colorable imitations of the AnnualCreditReport mark, which further demonstrates that the AnnualCreditReport mark has acquired distinctiveness and was famous and/or distinctive prior to the time of registration of the Defendant Domain Names.

135. Consumers have come to distinguish and recognize the legitimacy of Central Source's services as a result of the use and widespread promotion of the AnnualCreditReport mark. The AnnualCreditReport mark is entitled to common law trademark rights.

136. The AnnualCreditReport mark is also registered on the Principal Trademark Register of the U.S. Patent and Trademark Office under incontestable registration number 4152650. *See* Exhibit 108.

137. Central Source's federal registration for the AnnualCreditReport mark is *conclusive* evidence of the validity of the mark, of Central Source's ownership of the mark, and of Central Source's exclusive right to use the mark in U.S. commerce.

UNLAWFUL REGISTRATION AND/OR USE OF THE DOMAIN NAMES

138. Central Source has engaged in significant efforts to protect consumers by *inter alia* defensively registering domain names that represent typographical variations of

AnnualCreditReport and by pursuing the disabling of domain names that are being used to confuse and mislead consumers.

139. Where necessary, Central Source also has successfully pursued legal action to obtain the transfer to Central Source of domain names that infringe upon the AnnualCreditReport mark and were registered and/or used in bad faith.

140. Many of the Defendant Domain Names represent typographical errors of AnnualCreditReport. The registration and use of the Defendant Domain Names reflect a type of cybersquatting known as “typosquatting.”

141. Other Defendant Domain Names use confusingly similar variations of the AnnualCreditReport mark that include all the same components of the AnnualCreditReport mark but in a different order or with the addition of nondistinctive punctuation marks or words.

142. Upon information and belief, the Defendant Domain Names were registered for the purpose of obtaining Internet visitors when such visitors make a typographical error on their keyboard when attempting to reach AnnualCreditReport.com by typing “AnnualCreditReport.”

143. The Defendant Domain Names are configured to display pay-per-click advertisements, to redirect visitors to third-party websites purportedly for the purpose of sales solicitations, or to direct visitors to a website that attempts to force the visitor to download a computer virus—when the visitors were actually seeking the AnnualCreditReport service provided by Central Source through AnnualCreditReport.com.

144. Upon information and belief, the registrant(s) of the Defendant Domain Names receive compensation when Internet visitors, who were attempting to reach AnnualCreditReport.com, click on a link provided by a Defendant Domain Name to a third-party

website and/or when the Internet visitors are automatically redirected by a Defendant Domain Name to a third-party website for a sales solicitation.

145. Upon information and belief, the registrant(s) of the Defendant Domain Names receive compensation when Internet visitors, often unknowingly, download and install a computer virus from a website displayed at the Defendant Domain Names.

146. The use of the AnnualCreditReport mark within the Defendant Domain Names and/or associated websites is without authorization from Central Source.

147. Upon information and belief, the Defendant Domain Names do not and cannot reflect the legal name of the registrant(s) of the Domain Names.

148. Upon information and belief, the registrant(s) of the Defendant Domain Names has not engaged in bona fide noncommercial or fair use of the AnnualCreditReport mark in a website accessible under the Domain Names.

149. The websites displayed by the registrant(s) of the Defendant Domain Names are likely to be confused with Central Source's legitimate online location at AnnualCreditReport.com and actual consumer confusion is occurring in the marketplace.

150. Upon information and belief, the registrant(s) of the Defendant Domain Names registered the Domain Names with intent to divert consumers away from Central Source's online location at AnnualCreditReport.com, for commercial gain, by creating a likelihood of confusion as to the source, sponsorship, affiliation or endorsement of the Defendant Domain Names and the sites displayed through use of the Defendant Domain Names.

151. Upon information and belief, the Defendant Domain Names are being used to display websites that do not comply with the mandatory disclosure provisions of 15 U.S.C. § 1681j(g) and 12 C.F.R. § 1022.138.

152. Upon information and belief, the registrant(s) of the Defendant Domain Names provided material and misleading false contact information when applying for and maintaining the registration of the Defendant Domain Names in that the person or entity identified as the registrant of the Defendant Domain Names is not the true owner of the Domain Names.

153. Upon information and belief, the registrant(s) of certain of the Defendant Domain Name use services that replace a domain name owner's contact information with names such as "Registration Private", "Redacted for Privacy", "Super Privacy Service LTD c/o Dynadot", or the WhoIs records contain no registrant name field, and thereby conceal the identity of the true owner(s) of the domain name.

154. Upon information and belief, if the Defendant Domain Names were registered by different people or entities, the registrants of the Defendant Domain Names acted in concert given that groups of Defendant Domain Names were registered on the same date with the same registrar and the websites several of the Defendant Domain Names resolve to reflect similar content. *See* Exs. 1-107.

COUNT ONE:
(Violation of the Federal Anti-Cybersquatting Consumer Protection Act)

155. Central Source repeats and realleges each and every allegation set forth in the foregoing paragraphs, as though fully set forth herein.

156. Central Source's federally-registered AnnualCreditReport mark is famous and/or distinctive and was famous and/or distinctive prior to the time of registration of the Defendant Domain Names.

157. The aforesaid acts by the registrant(s) of the Defendant Domain Names constitute registration, maintenance, trafficking in, or use of domain names that are confusingly similar to Central Source's AnnualCreditReport mark, with bad faith intent to profit therefrom.

158. In light of the registrant's concealment of the identities of the true owners of the Defendant Domain Names and/or the registrant's location outside the United States, Central Source is not able to obtain *in personam* jurisdiction over the registrant(s) of the Defendant Domain Names or any other person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A).

159. Central Source, despite its due diligence, has been unable to find a person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A).

160. The aforesaid acts by the registrant(s) of the Domain Names constitute unlawful cyberpiracy in violation of the Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d)(1).

161. The aforesaid acts have caused, and are causing, great and irreparable harm to Central Source and the public. The harm to Central Source includes harm to the value and goodwill associated with the AnnualCreditReport mark that money cannot compensate. Unless permanently restrained and enjoined by this Court, said irreparable harm will continue. Thus, pursuant to 15 U.S.C. § 1125(d)(2)(D)(i), Central Source is entitled to an order directing the current registrars of the Defendant Domain Names to be changed to Central Source's registrar of choice and directing the registrant(s) to be changed to Central Source.

COUNT TWO:
(In-Rem Trademark Infringement)

162. Central Source repeats and realleges each and every allegation set forth in the foregoing paragraphs, as though fully set forth herein.

163. At the time the Defendant Domain Names were registered and/or used, Central Source possessed valid federal trademark rights in the AnnualCreditReport mark.

164. In light of the registrant's concealment of the identities of the true owners of the Defendant Domain Names and/or the registrant's location outside the United States, Central Source is not able to obtain *in personam* jurisdiction over the registrant(s) of the Defendant Domain Names or any other person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A).

165. Central Source, despite its due diligence, has been unable to find a person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A).

166. The registration and use of the Defendant Domain Names are a use in commerce.

167. The registration and use of the Defendant Domain Names affect Central Source's ability to use its AnnualCreditReport mark in commerce.

168. The Defendant Domain Names and their respective registrant(s) have no valid rights in the AnnualCreditReport mark.

169. At the time the Defendant Domain Names were registered and/or used, the Defendant Domain Names and their respective registrant(s) were on actual and/or constructive notice, pursuant to Section 22 of the Lanham Act, 15 U.S.C. § 1072, of the existence of Central Source's superior rights in its AnnualCreditReport mark by reason of the existence, at that time, of Central Source's aforesaid federal trademark rights.

170. Use by the Defendant Domain Names and their respective registrant(s) of the AnnualCreditReport mark is without the permission or authorization of Central Source.

171. The aforesaid registration and/or use of the Defendant Domain Names has caused and is likely to continue to cause confusion, mistake and/or deception among consumers and the public, leading the public falsely to believe that the Defendant Domain Names and/or websites

provided thereunder are those of, are sponsored or approved by, or are in some way connected with Central Source.

172. The aforesaid registration and use of the Defendant Domain Names constitute direct infringement of Central Source's trademark rights in violation of Section 32(1) of the Lanham Act, 15 U.S.C. § 1114(1).

173. The aforesaid acts have caused, and are causing, great and irreparable harm to Central Source and the public. The harm to the public includes frustrating consumers' federally protected right to a credit report and causing consumer confusion. The harm to Central Source includes harm to the value and goodwill associated with the AnnualCreditReport mark. Money cannot compensate either of these harms. Unless permanently restrained and enjoined by this Court, said irreparable harm will continue.

PRAYER FOR RELIEF

WHEREFORE, Central Source respectfully requests of this Court:

1. That judgment be entered in favor of Central Source on its claims of cybersquatting and trademark infringement.
2. That the Court order the registrars of the Defendant Domain Names be replaced with Central Source's registrar of choice and by such registrar's change of the registrant(s) to Central Source.
3. That the registrar of any other domain names registered by the registrant(s) of the Defendant Domain Names that resemble or include the AnnualCreditReport mark be replaced with Central Source's registrar of choice and that such registrar change of the registrant(s) to Central Source.

4. That the Court order an award of costs and reasonable attorney's fees incurred by Central Source in connection with this action pursuant to 15 U.S.C. § 1117(a); and

5. That the Court order an award to Central Source of such other and further relief as the Court may deem just and proper.

Dated: December 27, 2021 By: /s/ Attison L. Barnes, III
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